

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:  
ALL OPT OUT ACTIONS PENDING AGAINST  
DEFENDANTS NATIONAL FOOTBALL LEAGUE  
AND NFL PROPERTIES LLC

Hon. Anita B. Brody

**DECLARATION OF DOUGLAS M. BURNS**


**DOUGLAS M. BURNS**, being duly sworn, deposes and says:

1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss"), counsel to Defendants National Football League and NFL Properties LLC (collectively, the "NFL Defendants") in MDL No. 2323. I make this declaration, on personal knowledge, in support of the NFL and NFL Properties, LLC's Motion to Dismiss Plaintiffs' Second Amended Master Administrative Long-Form Complaint for Failure to State a Claim.

2. Attached as Appendix A is a chart listing Plaintiffs and current opt-outs, including certain relevant information such as the dates of their NFL careers, as provided in Plaintiffs' Short Form Complaints filed in this matter or as otherwise indicated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2017 at New York, New York.

  
Douglas M. Burns